

# **Appendix C**

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**Vinyl Chloride Continuous Monitoring System Program  
40 CFR 61.65(b)(8)(i)  
Formosa Plastics Corporation, Delaware**

**I LEAK DETECTION AND PLAN OF ACTION**

[REDACTED]

The Vinyl Chloride Monitoring System allows for quick detection of major Vinyl Chloride Monomer (VCM) leaks. The system has the capability to monitor [REDACTED] sample points throughout the facility. Currently, forty-six sample points are being used for EPA and OSHA monitoring. These sampling points are strategically located throughout the plant to detect or indicate leaks or VCM excursions from potential leak sources. (See Table 3 for equipment in VCM service.) Monitoring locations have been selected based on areas with the highest potential for VCM leaks. (See Table 1 for VCM sample point locations.)

Continuous air samples are taken from the sampling points selected throughout the facility. These samples are obtained in sequence by a digital programmer and analyzed in a gas chromatograph for VCM. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**II CALIBRATION OF MONITORING SYSTEM EQUIPMENT**

**A. Vinyl Chloride Monitoring System**

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For each of the gas chromatographs used in the Vinyl Chloride Monitoring System, a span check is performed daily using a calibration gas cylinder standard [REDACTED]

[REDACTED] This daily calibration will be done with a standard whose gas composition is certified by the manufacturer and has the recommended maximum shelf life, date of preparation, and certified vinyl chloride concentration affixed to the cylinder. [REDACTED]

**B. Portable Hydrocarbon Detector**

[REDACTED]

**III. MAINTENANCE**

[REDACTED]

[REDACTED]

**IV. RECORDKEEPING**

[REDACTED]

[REDACTED]

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[REDACTED]

**CONFIDENTIAL**VCM MONITORING SYSTEM SAMPLE POINT LOCATION

The VCM monitoring system sample points were selected based on areas with the highest potential for VCM leaks.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

TABLE 1

	GC1 S2 Reactor	GC2 Tank Farm	GC3 E2 Reactor	GC4 WWTP
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED] 8	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED] 2006-7-11	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

TABLE 2  
PREVENTATIVE MAINTENANCE SCHEDULE FOR VCM MONITORING SYSTEM

Auto Span Check (EPA)  
 Bottle and regulator inspection  
 Oven temperature check  
 Pump operation check  
 General Inspection of the sample valve manifold  
 Incinerator Continuous Emission Sample line test  
 Clean computer cabinet and filters  
 Alarm panel, emergency light, and standards test

[REDACTED]

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Detector and slide valve maintenance  
Sample valves  
Sample point filter replacement  
Pump maintenance  
Test Analog input boards  
Replace columns  
Test all samples valves for proper operation  
Emergency blue light I/O test  
Sample valves I/O test



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TABLE 3  
VCM HANDLING EQUIPMENT LIST

[illegible]

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<u>Equip No.</u>	<u>Equipment Name</u>
[REDACTED]	[REDACTED]